

COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

)

Cambridge Electric Light Company; ) D.T.E. 98-16

Commonwealth Electric Company; )

Five Year Energy Efficiency Plan ) **APPROVED BY COMMISSION**

for 1998-2002 ) **MARCH 31, 1999**

\_\_\_\_\_ ) **A. Quincy vale, Hearing Officer**

AMENDED JOINT MOTION FOR EXTENSION OF TIME FOR FILING 1999  
PERFORMANCE METRICS PROPOSAL

1. For reasons described in Paragraph 2 below, the undersigned parties in the above referenced docket hereby move that the Department of Telecommunications and Energy ("Department") approve an extension for the submission of a 1999 performance metrics proposal regarding the energy efficiency efforts of Cambridge Electric Light Company and Commonwealth Electric Company (collectively the "Companies") until April 1, 1999. This Motion has been agreed to by the Commonwealth of Massachusetts Division of Energy Resources, the Commonwealth of Massachusetts Office of the Attorney General, the Conservation Law Foundation, Inc., The Energy Consortium, IRATE, the FAP/WAP Network, including South Middlesex Opportunity Council, the Northeast Energy Efficiency Council, Enron Energy Services, and the Companies, together the "Parties."

2. The Parties entered the energy efficiency Settlement Agreement dated as of June 9, 1998 and approved by the Department in its Order in this docket on July 31, 1998 (the "D.T.E. 98-16 Settlement"). In Section IV of the D.T.E. 98-16 Settlement, the Parties agreed to undertake to file performance metrics for the Companies' 1999 energy efficiency activities on or before November 1, 1998. After an initial extension motion filed on November 25, 1998, on February 1, 1999, the Parties filed an Amended Joint Motion for Extension of Time for Filing 1999 Performance Metrics Proposal ("Joint Motion") seeking to extend the date for such performance metrics filing until March 1, 1999. Today's filing amends the Joint Motion as described below.

3. While the Settling Parties, working in good faith through the collaborative process established in the D.T.E. 98-16 Settlement, are currently reviewing metrics proposals for 1999, they have not been able to finalize such metrics on or before March 1, 1999. The Parties are currently continuing to work on developing such metrics and are taking additional time in developing such metrics in order to ensure consistency of metrics for electric utilities implementing similar DSM programs or collaborating in regional programs. The Parties believe that performance metrics for 1999 performance should be ready for filing with the Department in the next several weeks, but not later than April 1, 1999. Accordingly, the

Parties respectfully request that the Department approve of the extension of the date for filing 1999 performance metrics under the D.T.E. 98-16 Settlement from November 1, 1998 to April 1, 1999.

To the extent that the Department has questions concerning any terms of this Motion, the Parties will be pleased to respond.

Respectfully submitted,

---

Charles Kiely

Vice President - Customer Service for

CAMBRIDGE ELECTRIC LIGHT COMPANY

COMMONWEALTH ELECTRIC COMPANY

---

Bruce Ledgerwood for

DIVISION OF ENERGY RESOURCES

COMMONWEALTH OF MASSACHUSETTS

Rebeca C. Perez

Assistant Attorney General for

OFFICE OF THE ATTORNEY GENERAL,

COMMONWEALTH OF MASSACHUSETTS

Curt Collyer for

IRATE

Bruce Paul for

THE ENERGY CONSORTIUM

Paul Gromer for

NORTHEAST ENERGY EFFICIENCY

COUNCIL

Richard Kennelly for

CONSERVATION LAW FOUNDATION

Jerrold Oppenheim for

NATIONAL CONSUMER LAW CENTER FOR THE FAP/WAP/ NETWORK

---

Susan Nord for

ENRON ENERGY SERVICES

Dated as of March 8, 1999

k:\utl\50049547.nbe